

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	
	§	
OFFSHORE SPECIALTY	§	Case No. 17-35623
FABRICATORS, LLC,	§	
	§	(Chapter 11)
DEBTOR	§	

PLAINTIFF, KLEIN INVESTIGATIONS AND CONSULTING, A DIVISION OF KLEIN
INVESTMENTS, INC.'S WRITTEN OBJECTIONS TO THE DISCLOSURE
STATEMENT IN SUPPORT OF THE PLAN OF LIQUIDATION FOR OFFSHORE
SPECIALTY FABRICATORS, LLC

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff, Klein Investigations and Consulting, a Division of Klein Investments, Inc. (Klein), files these Written Objections to the Disclosure Statement in Support of the Plan of Liquidation for Offshore Specialty Fabricators, LLC (Debtor), and would show the Court as follows:

1. Klein objects, because it has not been fully identified as a creditor of the Debtor in this case. The current identification is merely "Klein Investigations & Consulting." There is no address listed, and there is no acknowledgment of Klein's representation by counsel. Klein should be identified fully as:

Klein Investigations & Consulting, a Division of
Klein Investments, Inc.
822 Nederland Avenue

Nederland, Texas 77627
c/o Attorney John S. Morgan
Morgan Law Firm
2175 North Street, Ste. 101
Beaumont, Texas 77701
(409) 239-5984
jmorgan@jsmorganlaw.com

2. Klein further objects, because on information and belief, Debtor has not identified all of the assets of Offshore. Specifically, Offshore owns a yacht, once owned by former President John F. Kennedy, called the "Honey Fitz." Attached as Exhibit "1" are the registration documents demonstrating it is an asset of this Debtor. Klein is not aware whether this yacht has been fully paid for, and Klein is not aware of any liens on Debtor's yacht.

3. Based on Klein's good faith information and belief, this yacht is currently operating in business and generating approximately \$25,000.00 per month in revenue for this Debtor, and Klein does know whether this income and the value of this asset has been properly reported by Debtor in this bankruptcy. This may materially affect the value of Debtor's assets to be distributed to the creditors pursuant to the Plan of Liquidation.

4. Accordingly, Klein Investigations & Consulting, a Division of Klein Investments, Inc., prays that this Court acknowledge its objections to the

Plaintiff liquidation of Debtor, and order Debtor acknowledge and correct these deficiencies identified herein, and grant Klein Investigations and Consulting, a Division of Klein Investments, Inc. such other and further relief, at law or in equity, to which it may be entitled.

Respectfully submitted,

/s/ John S. Morgan
JOHN S. MORGAN
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Jmorgan@jsmorganlaw.com
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

This hereby certify that a true and correct copy of the foregoing document has been provided to all parties of record, via electronic filing on this 12th day of July, 2018.

/s/ John S. Morgan
JOHN S. MORGAN